

SUPREME COURT OF THE STATE OF NEW YORK  
COUNTY OF NEW YORK-----X  
JOHN PITCHER and CAROLYN PITCHER,

Plaintiffs,

-against-

**UNION CARBIDE CORPORATION;**  
**AIR & LIQUID SYSTEMS CORPORATION**, sued  
as successor-by-merger to **BUFFALO PUMPS, INC.**; ;  
**ALFA LAVAL, INC.**, sued individually and as  
successor-in-interest to **THE DELAVAL**  
**SEPARATOR COMPANY**;  
**ARMSTRONG INTERNATIONAL, INC.**;  
**BARRETT'S MINERALS INC.**;  
**BEACON CMP CORPORATION**;  
**BLOCK DRUG COMPANY, INC.**, sued  
individually and as successor-in-interest to **THE**  
**GOLD BOND STERILIZING POWDER COMPANY**  
a/k/a **THE GOLD BOND COMPANY**;  
**BRENNNTAG NORTH AMERICA, INC.**, sued  
individually and as successor-in-interest to **MINERAL**  
**PIGMENT SOLUTIONS, INC.** and as successor-in-  
interest to **WHITTAKER CLARK & DANIELS,**  
**INC.**;  
**BRENNNTAG SPECIALTIES LLC f/k/a**  
**BRENNNTAG SPECIALTIES, INC. f/k/a MINERAL**  
**PIGMENT SOLUTIONS, INC.**, sued individually and  
as successor-in-interest to **WHITTAKER CLARK &**  
**DANIELS, INC.**;  
**COLGATE-PALMOLIVE COMPANY**;  
**CRANE CO.**, successor-in-interest to **CHAPMAN**  
**VALVE COMPANY** and **THE SWARWTOUT**  
**COMPANY**;  
**DCO LLC f/k/a DANA COMPANIES LLC**, sued  
individually and as successor-in-interest to **VICTOR**  
**GASKET MANUFACTURING COMPANY**;  
**DAP PRODUCTS, INC.**;  
**EATON HYDRAULICS LLC f/k/a EATON**  
**HYDRAULICS, INC.**, sued as successor to **VICKERS**  
**INC.**;  
**EDELBROCK CORPORATION**;  
**ELLIOTT COMPANY f/k/a and d/b/a ELLIOTT**  
**TURBOMACHINERY COMPANY**;

Index No.

Date of Filing: August 5, 2022

**SUMMONS**Plaintiffs designate  
NEW YORK COUNTY  
as the Place of TrialPlaintiffs reside at:  
300 Burning Tree Drive  
Georgetown, TX 78628

**ESTEE LAUDER, INC.**, a subsidiary of THE ESTEE LAUDER COMPANIES, INC.;  
**FLOWSERVE US, INC.**, sued as successor to EDWARD VALVE, INC.;  
**FMC CORPORATION**, sued individually and as successor-in-interest to CHICAGO PUMP COMPANY;  
**FORD MOTOR COMPANY**;  
**FOSTER WHEELER ENERGY CORPORATION**;  
**GARDNER DENVER, INC.**;  
**GENERAL ELECTRIC COMPANY**;  
**GG OF FLORIDA, INC.** f/k/a **HIGBEE, INC.** f/k/a HIGBEE GASKETS AND SEALING PRODUCTS, INC.;  
**GOULDS PUMPS LLC** f/k/a GOULDS PUMPS, INCORPORATED;  
**HOLLEY PERFORMANCE PRODUCTS, INC.**;  
**HOLLINGSWORTH & VOSE COMPANY**;  
**HONEYWELL INTERNATIONAL, INC.** f/k/a ALLIED-SIGNAL, INC., sued as successor-in-interest to BENDIX CORPORATION;  
**IMO INDUSTRIES, INC.**, sued individually and as successor-in-interest to DELAVAL TURBINE, INC.;  
**JOHN CRANE, INC.**;  
**MW CUSTOM PAPERS, LLC** as successor-in-interest to THE MEAD CORPORATION;  
**MORSE TEC LLC** f/k/a BORGWARNER MORSE TEC LLC, sued as successor-by-merger to BORG WARNER CORPORATION;  
**PARAMOUNT GLOBAL** f/k/a VIACOMCBS INC. f/k/a CBS CORPORATION f/k/a VIACOM, INC. successor-by-merger to CBS CORPORATION f/k/a WESTINGHOUSE ELECTRIC CORPORATION;  
**PFIZER INC.**;  
**REDCO CORPORATION** f/k/a CRANE CO.;  
ROBERTSHAW CONTROLS COMPANY d/b/a FULTON SYLPHON VALVES;  
**R. T. VANDERBILT HOLDING COMPANY, INC.**, sued individually and as successor-in-interest to R. T. VANDERBILT COMPANY, INC.;  
**SPECIALTY MINERALS INC.**, sued individually and as a subsidiary of MINERALS TECHNOLOGIES INC.;  
**SUPERIOR-LIDGERWOOD-MUNDY CORPORATION**, sued individually and as

successor-in-interest to M.T. DAVIDSON COMPANY;  
**VELAN VALVE CORP.** a/k/a VELAN VALVE CORPORATION;  
**VIAD CORP** f/k/a VIAD CORPORATION f/k/a THE DIAL CORPORATION, sued individually and as successor-in-interest to GRISCOM-RUSSELL COMPANY;  
**WARREN PUMPS, LLC**;  
**WEIR VALVES & CONTROLS USA, INC.** f/k/a ATWOOD & MORRILL;  
**WHITTAKER CLARK & DANIELS, INC.**;  
**ZURN INDUSTRIES, LLC**, individually and as successor-in-interest to ZURN INDUSTRIES, INC. successor to ERIE CITY IRON WORKS d/b/a KEYSTONE BOILER WORKS, INC.,

**Defendants.**

**TO THE ABOVE-NAMED DEFENDANTS:**

You are hereby summoned to answer in this action and to serve a copy of your answer, or if the complaint is not served with this summons, exclusive of the day of service (or within 30 days after the service is complete if this Summons is not personally delivered to you within the State of New York); and in case of your failure to appear or answer, judgment will be taken against you by default for the relief demanded in the Complaint.

Dated: August 5, 2022  
New York, New York

SIMON GREENSTONE PANATIER, PC  
Attorneys for Plaintiffs

**Brendan J. Tully**  
Brendan J. Tully, Esq.  
420 Lexington Avenue, Suite 2848  
New York, New York 10170  
Telephone: (212) 634-1690  
Facsimile: (212) 320-0526

**TO DEFENDANTS:****UNION CARBIDE CORPORATION**

Secretary of State  
One Commerce Plaza  
99 Washington Avenue  
Albany, NY 12231-0001

**AIR & LIQUID SYSTEMS CORPORATION**, sued as successor-by-merger to **BUFFALO PUMPS, INC.**

Corporation Service Company  
80 State Street  
Albany, NY 12207

**ALFA LAVAL, INC.**, sued individually and as successor-in-interest to **THE DELAVAL SEPARATOR COMPANY**; **CT Corporation System**, 28 Liberty Street, New York, NY 10005

**ARMSTRONG INTERNATIONAL, INC.**

David Dykstra  
900 Maple Street  
Three Rivers, MI 49093

**BARRETT'S MINERALS INC.**

**CT Corporation System**  
28 Liberty Street  
New York, NY 10005

**BEACON CMP CORPORATION**

Richard Loncar  
295 N. Michigan Avenue  
Kenilworth, NJ 07033

**BLOCK DRUG COMPANY, INC.**, sued individually and as successor-in-interest to **THE GOLD BOND STERILIZING POWDER COMPANY** a/k/a **THE GOLD BOND COMPANY** Corporation

Service Company  
Princeton South Corporate Center, Suite 160  
100 Charles Ewing Boulevard  
Ewing, NJ 08628

**BRENNETAG NORTH AMERICA, INC.**, sued individually and as successor-in-interest to **MINERAL PIGMENT SOLUTIONS, INC.** and as successor-in-interest to **WHITTAKER CLARK & DANIELS, INC.**

The Corporation Trust Company  
Corporation Trust Center  
1209 Orange Street  
Wilmington, DE 19801

**BRENNTAG SPECIALTIES LLC** f/k/a BRENNTAG SPECIALTIES, INC. f/k/a MINERAL PIGMENT SOLUTIONS, INC., sued individually and as successor-in-interest to WHITTAKER CLARK & DANIELS, INC.

CT Corporation System

28 Liberty Street

New York, NY 10005

**COLGATE-PALMOLIVE COMPANY**

The Corporation Trust Company

Corporation Trust Center

1209 Orange Street

Wilmington, DE 19801

**CRANE CO.** as successor-in-interest to CHAPMAN VALVE COMPANY and THE SWARWTOUT COMPANY

The Corporation Trust Company

Corporation Trust Center

1209 Orange Street

Wilmington, DE 19801

**DCO LLC** f/k/a DANA COMPANIES LLC, sued individually and as successor-in-interest to VICTOR GASKET MANUFACTURING COMPANY

CT Corporation System

4701 Cox Road, Suite 285

Glen Allen, VA 23060

**DAP PRODUCTS, INC.**

Corporation Service Company

251 Little Falls Drive

Wilmington, DE 19808

**EATON HYDRAULICS LLC** f/k/a EATON HYDRAULICS, INC., sued as successor to VICKERS INC.

CT Corporation System

28 Liberty Street

New York, NY 10005

**EDELBROCK CORPORATION**

Jeffrey L. Thompson

2700 California Street

Torrance, CA 90503

**ELLIOTT COMPANY** f/k/a and d/b/a ELLIOTT TURBOMACHINERY COMPANY

The Corporation Trust Company

Corporation Trust Center

1209 Orange Street

Wilmington, DE 19801

**ESTEE LAUDER, INC.**, a subsidiary of THE ESTEE LAUDER COMPANIES, INC.  
Corporation Service Company  
80 State Street  
Albany, NY 12207

**FLOWSERVE US, INC.**, sued as successor to EDWARD VALVE, INC.  
CT Corporation System  
28 Liberty Street  
New York, NY 10005

**FMC CORPORATION**, sued individually and as successor-in-interest to CHICAGO PUMP COMPANY  
CT Corporation System  
28 Liberty Street  
New York, NY 10005

**FORD MOTOR COMPANY**  
CT Corporation System  
28 Liberty Street  
New York, NY 10005

**FOSTER WHEELER ENERGY CORPORATION**  
United Agent Group Inc.  
600 Mamaroneck Avenue, Suite 400  
Harrison, NY 10528

**GARDNER DENVER, INC.**  
CT Corporation System  
28 Liberty Street  
New York, NY 10005

**GENERAL ELECTRIC COMPANY**  
Vice President, Litigation  
General Electric Company  
901 Main Avenue  
Norwalk, CT 06851

**GG OF FLORIDA, INC.** f/k/a HIGBEE, INC. f/k/a HIGBEE GASKETS AND SEALING PRODUCTS, INC.  
1728 Lane Avenue South  
Jacksonville, FL 32236

**GOULDS PUMPS LLC** f/k/a GOULDS PUMPS, INCORPORATED  
The Corporation Trust Company  
Corporation Trust Center  
1209 Orange Street  
Wilmington, DE 19801

**HOLLEY PERFORMANCE PRODUCTS, INC.**

Corporation Service Company  
251 Little Falls Drive  
Wilmington, DE 19808

**HOLLINGSWORTH & VOSE COMPANY**

Deirdre M. Murphy  
112 Washington Street  
East Walpole, MA 02032-1008

**HONEYWELL INTERNATIONAL, INC. f/k/a ALLIED-SIGNAL, INC., sued as successor-in-interest to BENDIX CORPORATION**

Corporation Service Company  
80 State Street  
Albany, NY 12207

**IMO INDUSTRIES, INC., sued individually and as successor-in-interest to DELAVAL TURBINE, INC.**

CT Corporation System  
28 Liberty Street  
New York, NY 10005

**JOHN CRANE, INC.**

CT Corporation System  
28 Liberty Street  
New York, NY 10005

**MW CUSTOM PAPERS, LLC as successor-in-interest to THE MEAD CORPORATION**

Corporation Service Company  
80 State Street  
Albany, NY 12207

**MORSE TEC LLC f/k/a BORGWARNER MORSE TEC LLC, sued as successor-by-merger to BORG WARNER CORPORATION**

CT Corporation System  
28 Liberty Street  
New York, NY 10005

**PARAMOUNT GLOBAL f/k/a VIACOMCBS INC. f/k/a CBS CORPORATION f/k/a VIACOM, INC. successor-by-merger to CBS CORPORATION f/k/a WESTINGHOUSE ELECTRIC CORPORATION)**

Corporation Service Company  
80 State Street  
Albany, NY 12207

**PFIZER INC.**

CT Corporation System  
28 Liberty Street  
New York, NY 10005

**REDCO CORPORATION f/k/a CRANE CO.**

The Corporation Trust Company  
Corporation Trust Center  
1209 Orange Street  
Wilmington, DE 19801

**ROBERTSHAW CONTROLS COMPANY d/b/a FULTON SYLPHON VALVES**

Registered Agent Solutions, Inc.  
838 Walker Road, Suite 21-2  
Dover, DE 19904

**R. T. VANDERBILT HOLDING COMPANY, INC.**, sued individually and as successor-in-interest to **R. T. VANDERBILT COMPANY, INC.**

Corporation Service Company  
80 State Street  
Albany, NY 12207

**SPECIALTY MINERALS INC.**, sued individually and as a subsidiary of **MINERALS TECHNOLOGIES INC.**

CT Corporation System  
28 Liberty Street  
New York, NY 10005

**SUPERIOR-LIDGERWOOD-MUNDY CORPORATION**, sued individually and as successor-in-interest to **M.T. DAVIDSON COMPANY**

Arthur Robert Woodman  
302 Grand Avenue  
Superior, WI 54880

**VELAN VALVE CORP. a/k/a VELAN VALVE CORPORATION**

Corporation Service Company  
80 State Street  
Albany, NY 12207

**VIAD CORP f/k/a VIAD CORPORATION f/k/a THE DIAL CORPORATION**, sued individually and as successor-in-interest to **GRISCOM-RUSSELL COMPANY**

CT Corporation System  
28 Liberty Street  
New York, NY 10005

**WARREN PUMPS, LLC**

The Corporation Trust Company  
Corporation Trust Center  
1209 Orange Street  
Wilmington, DE 19801

**WEIR VALVES & CONTROLS USA, INC. f/k/a ATWOOD & MORRILL**  
29 Old Right Road  
Ipswich, MA 01938-1119

**WHITTAKER CLARK & DANIELS, INC.**

Joe Cobuzio  
Tompkins, McGuire, Wacenfeld & Barry  
3 Becker Farm Road, 4th Floor  
Roseland, NJ 07068

**ZURN INDUSTRIES, LLC**, sued individually and as successor-in-interest to **ZURN INDUSTRIES, INC.** successor to **ERIE CITY IRON WORKS d/b/a KEYSTONE BOILER WORKS, INC.**

CT Corporation System  
28 Liberty Street  
New York, NY 10005

SUPREME COURT OF THE STATE OF NEW YORK  
COUNTY OF NEW YORK-----X  
**JOHN PITCHER and CAROLYN PITCHER,**

Index No.

Plaintiffs,

Date of Filing: August 5, 2022

-against-

**COMPLAINT**

Plaintiffs demand a trial by jury.

**UNION CARBIDE CORPORATION;**  
**AIR & LIQUID SYSTEMS CORPORATION,**  
sued as successor-by-merger to **BUFFALO**  
**PUMPS, INC.;**  
**ALFA LAVAL, INC.**, sued individually and as  
successor-in-interest to **THE DELAVAL**  
**SEPARATOR COMPANY**;  
**ARMSTRONG INTERNATIONAL, INC.;**  
**BARRETT'S MINERALS INC.;**  
**BEACON CMP CORPORATION**;  
**BLOCK DRUG COMPANY, INC.**, sued  
individually and as successor-in-interest to **THE**  
**GOLD BOND STERILIZING POWDER**  
**COMPANY a/k/a THE GOLD BOND**  
**COMPANY**;  
**BRENNETAG NORTH AMERICA, INC.**, sued  
individually and as successor-in-interest to  
**MINERAL PIGMENT SOLUTIONS, INC.** and as  
successor-in-interest to **WHITTAKER CLARK &**  
**DANIELS, INC.**;  
**BRENNETAG SPECIALTIES LLC f/k/a**  
**BRENNETAG SPECIALTIES, INC. f/k/a**  
**MINERAL PIGMENT SOLUTIONS, INC.**, sued  
individually and as successor-in-interest to  
**WHITTAKER CLARK & DANIELS, INC.;**  
**COLGATE-PALMOLIVE COMPANY**;  
**CRANE CO.**, successor-in-interest to **CHAPMAN**  
**VALVE COMPANY** and **THE SWARWTOUT**  
**COMPANY**;  
**DCO LLC f/k/a DANA COMPANIES LLC**, sued  
individually and as successor-in-interest to  
**VICTOR GASKET MANUFACTURING**  
**COMPANY**;  
**DAP PRODUCTS, INC.;**  
**EATON HYDRAULICS LLC f/k/a EATON**  
**HYDRAULICS, INC.**, sued as successor to  
**VICKERS INC.;**

**EDELBROCK CORPORATION;**  
**ELLIOTT COMPANY** f/k/a and d/b/a **ELLIOTT TURBOMACHINERY COMPANY;**  
**ESTEE LAUDER, INC.**, a subsidiary of **THE ESTEE LAUDER COMPANIES, INC.;**  
**FLOWSERVE US, INC.**, sued as successor to **EDWARD VALVE, INC.;**  
**FMC CORPORATION**, sued individually and as successor-in-interest to **CHICAGO PUMP COMPANY;**  
**FORD MOTOR COMPANY;**  
**FOSTER WHEELER ENERGY CORPORATION;**  
**GARDNER DENVER, INC.;**  
**GENERAL ELECTRIC COMPANY;**  
**GG OF FLORIDA, INC.** f/k/a **HIGBEE, INC.**  
f/k/a **HIGBEE GASKETS AND SEALING PRODUCTS, INC.;**  
**GOULDS PUMPS LLC** f/k/a **GOULDS PUMPS, INCORPORATED;**  
**HOLLEY PERFORMANCE PRODUCTS, INC.;**  
**HOLLINGSWORTH & VOSE COMPANY;**  
**HONEYWELL INTERNATIONAL, INC.** f/k/a **ALLIED-SIGNAL, INC.**, sued as successor-in-interest to **BENDIX CORPORATION;**  
**IMO INDUSTRIES, INC.**, sued individually and as successor-in-interest to **DELAVAL TURBINE, INC.;**  
**JOHN CRANE, INC.;**  
**MW CUSTOM PAPERS, LLC** as successor-in-interest to **THE MEAD CORPORATION;**  
**MORSE TEC LLC** f/k/a **BORGWARNER**  
**MORSE TEC LLC**, sued as successor-by-merger to **BORG WARNER CORPORATION;**  
**PARAMOUNT GLOBAL** f/k/a **VIACOMCBS INC.** f/k/a **CBS CORPORATION** f/k/a **VIACOM, INC.** successor-by-merger to **CBS CORPORATION** f/k/a **WESTINGHOUSE ELECTRIC CORPORATION;**  
**PFIZER INC.;**  
**REDCO CORPORATION** f/k/a **CRANE CO.;**  
**ROBERTSHAW CONTROLS COMPANY**  
d/b/a **FULTON SYLPHON VALVES;**

**R. T. VANDERBILT HOLDING COMPANY, INC.**, sued individually and as successor-in-interest to R. T. VANDERBILT COMPANY, INC.; **SPECIALTY MINERALS INC.**, sued individually and as a subsidiary of MINERALS TECHNOLOGIES INC.; **SUPERIOR-LIDGERWOOD-MUNDY CORPORATION**, sued individually and as successor-in-interest to M.T. DAVIDSON COMPANY; **VELAN VALVE CORP.** a/k/a VELAN VALVE CORPORATION; **VIAD CORP** f/k/a VIAD CORPORATION f/k/a THE DIAL CORPORATION, sued individually and as successor-in-interest to GRISCOM-RUSSELL COMPANY; **WARREN PUMPS, LLC**; **WEIR VALVES & CONTROLS USA, INC.** f/k/a ATWOOD & MORRILL; **WHITTAKER CLARK & DANIELS, INC.**; **ZURN INDUSTRIES, LLC**, individually and as successor-in-interest to ZURN INDUSTRIES, INC. successor to ERIE CITY IRON WORKS d/b/a KEYSTONE BOILER WORKS, INC.,

Defendants.

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**TO THE ABOVE-NAMED DEFENDANTS:**

Plaintiffs JOHN PITCHER and CAROLYN PITCHER, by and through their attorneys, SIMON GREENSTONE PANATIER, PC, for their Complaint respectfully allege:

1. Plaintiffs repeat and reallege Simon Greenstone Panatier, PC's New York City Asbestos Litigation Standard Complaint No. 1 as if fully incorporated herein.<sup>1</sup>
2. Plaintiffs JOHN PITCHER and CAROLYN PITCHER reside at 300 Burning Tree Drive, Georgetown, Texas 78628.

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<sup>1</sup> A copy of Simon Greenstone Panatier, PC's New York City Asbestos Litigation Standard Asbestos Complaint for Personal Injury No. 1 is attached hereto as Exhibit "A."

3. Plaintiff JOHN PITCHER has been diagnosed with malignant mesothelioma as a result of his regular and repeated exposure to asbestos from the Defendants' asbestos-contaminated products, including in New York State. Plaintiff meets the minimum requirement for activation into the active docket pursuant to the Case Management Order governing these actions.

#### PARTIES

4. At all times relevant, Defendant **UNION CARBIDE CORPORATION** was a corporation organized under the laws of the State of New York with its principal place of business in Texas.

5. At all times relevant, Defendant **AIR & LIQUID SYSTEMS CORPORATION**, sued as successor-by-merger to **BUFFALO PUMPS, INC.**, was a corporation organized under the laws of the State of Pennsylvania with its principal place of business in New York.

6. At all times relevant, Defendant **ALFA LAVAL, INC.**, sued individually and as successor-in-interest to **THE DELAVAL SEPARATOR COMPANY**, was a corporation organized under the laws of the State of New Jersey with its principal place of business in Virginia.

7. At all times relevant, Defendant **ARMSTRONG INTERNATIONAL, INC.** was a corporation organized under the laws of the State of Michigan with its principal place of business in Michigan.

8. At all times relevant, Defendant **BARRETT'S MINERALS INC.** was a corporation organized under the laws of the State of Delaware with its principal places of business in Montana and New York.

9. At all times relevant, Defendant **BEACON CMP CORPORATION** was a corporation organized under the laws of the State of New Jersey with its principal place of business in New Jersey.

10. At all times relevant, Defendant **BLOCK DRUG COMPANY, INC.**, sued individually and as successor-in-interest to THE GOLD BOND STERILIZING POWDER COMPANY a/k/a THE GOLD BOND COMPANY, was a corporation organized under the laws of the State of New Jersey with its principal place of business in New Jersey.

11. At all times relevant, Defendant **BRENNTAG NORTH AMERICA, INC.**, sued individually and as successor-in-interest to MINERAL PIGMENT SOLUTIONS, INC. and as successor-in-interest to WHITTAKER CLARK & DANIELS, INC., was a corporation organized under the laws of the State of Delaware with its principal place of business in Pennsylvania.

12. At all times relevant, Defendant **BRENNTAG SPECIALTIES LLC** f/k/a BRENNTAG SPECIALTIES, INC. f/k/a MINERAL PIGMENT SOLUTIONS, INC., sued individually and as successor-in-interest to WHITTAKER CLARK & DANIELS, INC., was a corporation organized under the laws of the State of Delaware with its principal place of business in New Jersey.

13. At all times relevant, Defendant **COLGATE-PALMOLIVE COMPANY** was a corporation organized under the laws of the State of Delaware with its principal place of business in New York.

14. At all times relevant, Defendant **CRANE CO.**, as successor-in-interest to CHAPMAN VALVE COMPANY and THE SWARWTOUT COMPANY, was a corporation organized under the laws of the State of Delaware with its principal place of business in Connecticut.

15. At all times relevant, Defendant **DCO LLC** f/k/a DANA COMPANIES LLC, sued individually and as successor-in-interest to VICTOR GASKET MANUFACTURING COMPANY, was a limited liability company organized under the laws of the State of Virginia

with its principal place of business in New Jersey. To the best of Plaintiffs' knowledge, the managing members of **DCO LLC** f/k/a **DANA COMPANIES LLC**, sued individually and as successor-in-interest to **VICTOR GASKET MANUFACTURING COMPANY**, are Vicki L. Stringham and Joseph A. Stancati who reside in Perrysburg, Ohio. Therefore Defendant **DCO LLC** f/k/a **DANA COMPANIES LLC**, sued individually and as successor-in-interest to **VICTOR GASKET MANUFACTURING COMPANY**, is a resident of the State of Ohio.

16. At all times relevant, Defendant **DAP PRODUCTS, INC.** was a corporation organized under the laws of the State of Delaware with its principal place of business in Maryland.

17. At all times relevant, Defendant **EATON HYDRAULICS LLC** f/k/a **EATON HYDRAULICS, INC.**, sued as successor to **VICKERS INC.**, was a limited liability company organized under the laws of the State of Delaware with its principal place of business in Ohio. To the best of Plaintiffs' knowledge, the managing member of Defendant **EATON HYDRAULICS LLC** f/k/a **EATON HYDRAULICS, INC.**, sued as successor to **VICKERS INC.**, is Eaton Corporation, an Ohio corporation with its principal place of business in Ohio. Therefore, Defendant **EATON HYDRAULICS LLC** f/k/a **EATON HYDRAULICS, INC.**, sued as successor to **VICKERS INC.**, is a resident of the State of Ohio.

18. At all times relevant, Defendant **EDELBROCK CORPORATION** was a corporation organized under the laws of the State of Delaware with its principal place of business in California.

19. At all times relevant, Defendant **ELLIOTT COMPANY** f/k/a and d/b/a **ELLIOTT TURBOMACHINERY COMPANY** was a corporation organized under the laws of the State of Delaware with its principal places of business in Pennsylvania and Texas.